

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.  
Jamil Thomas

Case No. Case: 2:21-mj-30529  
Judge: Unassigned,  
Filed: 11-09-2021 At 06:12 PM  
USA v. JAMIL THOMAS (CMP)(MLW)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 26, 2021 in the county of Washtenaw in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Possession of a firearm by a convicted felon

This criminal complaint is based on these facts:  
see attached affidavit.

Continued on the attached sheet.



Complainant's signature

Michael S. Parsons, Special Agent (ATF)  
Printed name and title



Judge's signature

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: November 9, 2021

City and state: Detroit, Michigan

Hon. Anthony P. Patti, United States Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Michael S. Parsons, being duly sworn, do hereby state the following:

**I. INTRODUCTION**

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been a Special Agent since September of 2000. I have been involved in numerous investigations regarding firearms, firearms licensing, and narcotic laws resulting in successful federal prosecutions.

2. The statements contained in this affidavit are based on my personal knowledge, my review of written police reports by the Washtenaw County Sheriff's Office (WCSO), and information provided to me by and/or through other law enforcement agents, investigators, and individuals with knowledge of this matter. This affidavit does not provide all the information known to law enforcement about this investigation. This affidavit provides information necessary to establish probable cause that Jamil THOMAS (XX/XX/1990) has violated 18 U.S.C. § 922(g)(1) – Possession of a Firearm by a Convicted Felon.

## **II. PROBABLE CAUSE**

3. On July 26, 2021, at approximately 01:08 am, WCSO Deputies assigned to road patrol witnessed a silver Ford Escape, with license plate number XXXXX59, traveling westbound on Clark Road with no taillights. Deputies stopped the silver Escape at Ford Boulevard and Clark Road, Ypsilanti Charter Township, Michigan. Deputy Howard approached the driver's side of the vehicle; Deputy Bland approached the passenger side of the vehicle. As Deputy Howard was advising the driver, JAMIL THOMAS, of the reason for the stop, Deputy Bland observed the grip of a handgun protruding from the waistband of the passenger, Demetrius Willis. Both occupants were placed into custody without incident.

4. Under THOMAS's seat, deputies located a .45 caliber, Springfield Armory Model XDs pistol. Deputies also recovered a 9mm caliber, Springfield Armory Model XDs pistol from Willis's front waistband.

5. On August 30, 2021, I queried the Ford Escape's license plate number (XXXX59) through the Law Enforcement Information

Network (LEIN). LEIN revealed that the Ford Escape is registered to INDIVIDUAL A, at XXX Villa Dr., Ypsilanti, Michigan.

6. On September 6, 2021, myself, ATF SA Loy and WCSO Deputy Hogan interviewed INDIVIDUAL A outside of her residence of XXX Villa Dr., Ypsilanti, Michigan. Prior to making contact with INDIVIDUAL A, her Ford Escape pulled into the parking lot. The driver of the vehicle was Jamil THOMAS, and he was the only occupant of the vehicle. THOMAS exited the vehicle and walked to XXX Villa Dr., knocked on the front door and was quickly let inside of the residence. Shortly after, Deputy Hogan knocked on the front door and INDIVIDUAL A answered. INDIVIDUAL A stated that she owned the silver Ford Escape parked in front of her residence. When asked who just drove her vehicle, INDIVIDUAL A stated that it was a friend and refused to identify the driver. INDIVIDUAL A stated that she does not own any firearms and that there is no reason why a firearm would be in her vehicle. INDIVIDUAL A stated that she knew nothing about the incident on July 26, 2021, and that she had nothing to do with it. INDIVIDUAL A stated that the vehicle was not stolen and that she allows friends to drive her vehicle when needed.

7. A criminal history check was conducted on THOMAS, which revealed that he has been convicted of the following felonies:

- a. 2010 – Police Officer Assaulting/Resisting/Obstructing – 22<sup>nd</sup> Circuit Court.
- b. 2010 – Police Officer Assaulting/Resisting/Obstructing - 22<sup>nd</sup> Circuit Court.
- c. 2010 – Conspiracy – Felony Home Invasion – 2nd Degree - 22<sup>nd</sup> Circuit Court.
- d. 2010 – Home Invasion – 2nd Degree - 22<sup>nd</sup> Circuit Court.
- e. 2015 – Weapons – Carrying Concealed - 22<sup>nd</sup> Circuit Court.

8. On October 25, 2021, I received THOMAS's Michigan Department of Corrections (MDOC) Prisoner Pre-Release Notice that was signed and dated by him on December 16, 2016. Within this notice, THOMAS acknowledges with his signature that he is a convicted felon and therefore prohibited from “use, brandish, display, carry or otherwise possess a firearm...”

9. I am an expert in the Interstate Nexus of Firearms. The Springfield Armory Model XDs, .45 caliber pistol, recovered from under THOMAS's seat, was manufactured outside the State of Michigan, thereby travelling in interstate commerce.

### III. CONCLUSION

10. Probable cause exists that Jamil THOMAS, in Ypsilanti Charter Township in the Eastern District of Michigan, knowingly possessed the above-described firearm: said firearm having traveled in interstate commerce; in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



Michael S. Parsons, Special Agent  
Bureau of Alcohol, Tobacco, Firearms  
and Explosives

Sworn to before me and signed in my presence and/or by reliable electronic means.



HON. ANTHONY P. PATTI  
UNITED STATES MAGISTRATE JUDGE

Date: November 9, 2021